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7 Counsel for Defendants

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10

11 HANY M. ABDOU,

12 Plaintiff,

13 v.

14 MICHAEL CHERTOFF, Secretary,) Department of Homeland Security; EMILO)
15 GONZALEZ, Director, United States) Citizenship and Immigration Services;)
16 PAUL PIERRE, District Director, U.S.) Citizenship and Immigration Services, San)
17 Diego District; CHRISTINA POULOS,) Director, U.S. Citizenship and Immigration)
18 Services, California Service Center;) MICHAEL B. MUKASEY, U.S. Attorney)
19 General; ROBERT MUELLER, Director,) Federal Bureau of Investigation,)

20 Defendants.
21

Case No. 07cv2292-BTM (NLS)

SUPPLEMENTAL JOINT MOTION TO
EXTEND TIME TO FILE RESPONSIVE
PLEADING

[Fed.R.Civ.P. 6(b)(1)]

22 COME NOW THE PARTIES, Plaintiff Hany Abdou, by and through his counsel, Leah W.
23 Hurwitz, and Defendants Michael Chertoff, Secretary, U.S. Department of Homeland Security, et al., by
24 and through their counsel, Karen P. Hewitt, United States Attorney, and Megan Callan, Assistant United
25 States Attorney, and hereby jointly move the Court to extend the time for filing of Defendants'
26 responsive pleading.

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1 Plaintiff applied for naturalization under 8 U.S.C. § 1421 et seq. on or about November 8, 2005.
 2 Plaintiff complains that Defendants have failed to process his application in a timely manner and prays
 3 this Court order the adjudication of his application or otherwise order the expedition of the administrative
 4 processing of his naturalization application.

5 In an effort to address Plaintiff's Complaint extrajudicially and without waiving Defendants'
 6 rights to defend the causes of actions and allegations, including the right to file any Fed. R. Civ. P. 12
 7 motions to dismiss, the parties now jointly request that the Court extend the date upon which Defendants'
 8 responsive pleading is due for sixty (60) days until **May 9, 2008**.

9 The parties previously requested an extension of time and continue to work together toward
 10 resolution of Plaintiff's claims. The parties jointly request this time extension as the adjudication of
 11 Plaintiff's application is currently ongoing, and the parties believe that the application can be resolved
 12 without judicial intervention.

13 Based upon the foregoing, it is respectfully requested that the Court enter an order, under
 14 Fed. R. Civ. P. 6(b)(1), expanding the time for the filing of Defendants' responsive pleading to **May 9,**
 15 **2008.**

16
 17 Dated: February 22, 2008

s/ Leah Hurwitz
 Counsel for Plaintiff
 E-Mail: lhurw8000@aol.com

18
 19 Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures
 20 of the United States District Court for the Southern District of California, I certify that the content of this
 21 document is acceptable to counsel for the Plaintiff and that I have obtained authorization from Leah
 22 Hurwitz to affix her electronic signature to this document.

23 Dated: February 22, 2008

Respectfully Submitted,

KAREN P. HEWITT
 United States Attorney

s/ Megan Callan

MEGAN CALLAN
 Assistant U.S. Attorney
 Counsel for Defendants
 Email: Megan.Callan@usdoj.gov